

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND**

RICHARD PAIVA
Plaintiff

v.

**RHODE ISLAND DEPARTMENT OF
CORRECTIONS**
Defendant

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C.A. 17-14-JJM

DEFENDANT'S MOTION FOR LEAVE TO FILE SUPPLEMENTAL MEMORANDUM

Now come Defendant and hereby respectfully moves for leave to file a supplemental memorandum to its response to this Court's order filed on January 28, 2019.

Respectfully submitted,
DEFENDANT,
By its Attorney,
MICHAEL B. GRANT

/s/ Michael B. Grant

Michael B. Grant, Bar No. 3864
Deputy Chief Legal Counsel
40 Howard Avenue
Cranston, RI 02920
Tel: (401) 462-2910
Fax: (401) 462-2910

CERTIFICATION

I, the undersigned, hereby certify that a copy of the within Motion for Extension of Time was mailed, via first-class mail, postage prepaid, on this 1st day of March, 2019, to the following:

Richard Paiva, Pro Se
Department of Corrections
P.O. Box 8200
Cranston, RI 02920

/S/ Michael B. Grant

FOR THE DISTRICT OF RHODE ISLAND

RICHARD PAIVA
Plaintiff

v.

**RHODE ISLAND DEPARTMENT OF
CORRECTIONS**
Defendants

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C.A. 17-14-JJM

DEFENDANT'S MOTION FOR LEAVE TO FILE A SUPPLEMENTAL MEMORANDUM

Defendant wishes to present additional arguments to those submitted with this Court on January 28, 2019, in support of why this Honorable Court should not entertain Plaintiff's motion which alleges a violation of the *Morris* injunction. If permitted, Defendant shall file a supplemental memorandum no later than March 13, 2019.

R.I. DEPARTMENT OF CORRECTIONS,
By its Attorney,

/s/ Michael B. Grant

Michael B. Grant, Esquire (#3864)
R.I Department of Corrections
40 Howard Avenue
Cranston, Rhode Island 02920
TEL: (401) 462-0145
FAX: (401) 462-2583

CERTIFICATION

I hereby certify that I filed the within document via the ECF filing system and that a copy is available for viewing and downloading. On 3/1/19, I have also caused a copy to be mailed to:

Richard Lee Paiva, pro se
ACI – High Security Center
P.O. Box 8200
Cranston, RI 02920

Michael B. Grant
